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Attorney for Petitioner Nexon Korea Corporation

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

In re DMCA Subpoena to Discord, Inc.

MISC. CASE NO. 3:24-mc-80273

**DECLARATION OF AMANDA L. BRUSS  
 IN SUPPORT OF REQUEST FOR  
 SUBPOENA TO DISCORD, INC.  
 PURSUANT TO 17 U.S.C. § 512(H)**

I, Amanda L. Bruss, declare and testify as follows:

1. I am an attorney at law, duly licensed to practice in the State of California since 2006, State Bar of California No. 246249. I am over the age of majority and under no legal impediment to state the following facts, all of which are true and correct:

2. My law firm and I have been engaged to represent Nexon Korea Corporation (“Nexon”), a South Korean game development company, in connection with this matter. By operation of such engagement and my admission to the State Bar of California, I am authorized and qualified to make this declaration for and on Nexon’s behalf, and I make this declaration for that reason.

3. Nexon seeks the issuance of subpoena from this Court pursuant to 17 U.S.C. § 512(h) to obtain information sufficient to identify the persons infringing its copyrighted works. Such dentification

1 is sought so that Nexon, the rightful copyright holder, can seek legal redress against such infringers.  
2 Such personally identifying information will only be used for the purpose of protecting Nexon's rights  
3 under the Copyright Act, 17 U.S.C. § 101, et. seq.

4 4. Under 17 U.S.C. § 512(c)(3)(A), persons authorized to act on Nexon's behalf submitted  
5 takedown notices to Discord, Inc. Identifying the infringing by the infringing user(s) and providing the  
6 information required by 17 U.S.C. § 512(c)(3)(A). A true and accurate copy of the submitted notification  
7 is attached hereto as Exhibit 1.

8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United  
9 States of America that the foregoing is true and correct to the best of my knowledge, information and  
10 belief.

11 DATED: November 5, 2024

Respectfully Submitted,

13 BRUSS LEGAL PLLC

14 By: /s/ Amanda L. Bruss  
15 Amanda Bruss (SBN 246249)  
16 Bruss Legal PLLC  
17 7550 East 53rd Place #172464  
18 Denver, CO 80217  
19 Tel: (415) 271-5754  
20 E-mail: [amanda@brusslegal.com](mailto:amanda@brusslegal.com)

21 Attorney for Petitioner Nexon Korea Corporation  
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## **EXHIBIT 1**



SUL LEE LAW FIRM, PLLC  
3030 Lyndon B Johnson Fwy  
Ste 220, Dallas TX 75234  
Tel 214-206-4064  
Fax 214-206-4068  
Website [www.sulleelaw.com](http://www.sulleelaw.com)

May 9, 2024

Discord  
ATTN: DMCA Agent  
444 De Haro Street, Suite 200  
San Francisco, California 94107

*Via CMRRR:*  
*Via email:* [copyright@discord.com](mailto:copyright@discord.com)

**RE: Digital Millenium Copyright Act (DMCA) Takedown Request**

Dear Discord,

The undersigned firm represents Nexon Korea Corporation (“Nexon” or the “Copyright Owner”), the developer of MapleStory, a two-dimensional, side-scrolling multiplayer online role-playing game. We hereby provide notice of copyright infringement pursuant to the terms of the Digital Millenium Copyright Act (the “DMCA”) and Discord’s Copyright and IP Policy.

Nexon is the owner of the copyright in the following work(s) (the “Work”):

1. MapleStory, <https://maplestory.nexon.com/>

It has come to the Copyright Owner’s attention that your service located at the URLs as listed in Exhibit 1 (the “Service”) provides access to materials that infringe Copyright Owner’s copyright in the Work. Exhibit 1, as attached hereto, provides a list of the infringing material at issue and the URLs at which the infringing material is accessible on the Service.

The use of the Work in any manner described in this letter is **not authorized** by the Copyright Owner, any agent of the Owner, or any applicable law. As the duly authorized attorneys for the Copyright Owner, we have a good faith basis to believe that all information contained in this notification is accurate. This letter shall serve as a request that you remove or disable access to the infringing materials as set forth in Section 512(c)(1)(C) and Section 512(d)(3) of the DMCA and pursuant to your Copyright and IP Policy.

Please contact the undersigned no later than **ten days from the date of this letter** to confirm that the infringing materials have been removed or access disabled. The undersigned may be contacted at the mailing address, telephone number, and email address set forth as follows:

Name: Sul Lee Law Firm, PLLC  
Address: 3030 LBJ Fwy Ste. 220, Dallas, Texas 75234  
Telephone: (214) 206-4064  
Email: [jdejesus@sulleelaw.com](mailto:jdejesus@sulleelaw.com)  
CC: [sul@sulleelaw.com](mailto:sul@sulleelaw.com) and [kkim@sulleelaw.com](mailto:kkim@sulleelaw.com)

Sincerely,  
**AGENT FOR NEXON KOREA CORPORATION**  
**Sul Lee Law Firm, PLLC**

/s/ Jian De Jesus  
Jian De Jesus  
Associate Attorney

**Exhibit 1****1. Infringed Work – MapleStory**

<b>Server Name</b>	<b>Category</b>	<b>Description</b>
나나스 토리	Website (if applicable)	
	Discord Server ID	1131827395104616561
	Infringer UID	1125676006502584330
	Invite Code	<a href="http://discord.gg/cFvMbhfVq4">http://discord.gg/cFvMbhfVq4</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1131827395104616561/1131851269758255155/1134363931884920892">https://discord.com/channels/1131827395104616561/1131851269758255155/1134363931884920892</a>
라퓨타	Website (if applicable)	
	Discord Server ID	1144653296582279278
	Infringer UID	1144651337448038591
	Invite Code	<a href="https://discord.com/invite/ZjDt3WJ8bc">https://discord.com/invite/ZjDt3WJ8bc</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1144653296582279278/1152146049553678347/1152146049553678347">https://discord.com/channels/1144653296582279278/1152146049553678347/1152146049553678347</a>
멜로디	Website (if applicable)	
	Discord Server ID	1167414439348281354
	Infringer UID	1167410172554129475
	Invite Code	<a href="https://discord.gg/mYTRbpS2mY">https://discord.gg/mYTRbpS2mY</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1167414439348281354/1172384579986927747/1179067706327191650">https://discord.com/channels/1167414439348281354/1172384579986927747/1179067706327191650</a>
니르바 나	Website (if applicable)	
	Discord Server ID	1109426846015164416
	Infringer UID	1033704371348852848, 434092344581816330
	Invite Code	<a href="https://discord.gg/9tBpPUpMYX">https://discord.gg/9tBpPUpMYX</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1109426846015164416/1109428605487956069/1159593905973645372">https://discord.com/channels/1109426846015164416/1109428605487956069/1159593905973645372</a>
토이스 토리	Website (if applicable)	
	Discord Server ID	1171080157210103808
	Infringer UID	1184303439065382922
	Invite Code	<a href="https://discord.gg/RGdwnbH28E">https://discord.gg/RGdwnbH28E</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1171080157210103808/1171084695879037060/1184770165209038878">https://discord.com/channels/1171080157210103808/1171084695879037060/1184770165209038878</a>
레드문	Website (if applicable)	
	Discord Server ID	1133391293612044479
	Infringer UID	1133582126474870836, 709441980161196043, 913299175762980945
	Invite Code	<a href="https://discord.gg/vGVJJhZ7hf">https://discord.gg/vGVJJhZ7hf</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1133391293612044479/1133399598434627756/1134377691768950825">https://discord.com/channels/1133391293612044479/1133399598434627756/1134377691768950825</a>
코인	Website (if applicable)	
	Discord Server ID	1181037526249639936
	Infringer UID	1181016465651007582, 402773028137861132,



		863066127188754493, 926752939090014228
	Invite Code	<a href="https://discord.gg/pFw33fw4">https://discord.gg/pFw33fw4</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1181037526249639936/1181060778091085894/1186620510432399401">https://discord.com/channels/1181037526249639936/1181060778091085894/1186620510432399401</a>
엘리트	Website (if applicable)	
	Discord Server ID	1032262304387059754
	Infringer UID	311386662015860736
	Invite Code	<a href="https://discord.com/invite/sWSnfG5PxX">https://discord.com/invite/sWSnfG5PxX</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1032262304387059754/1117670153774170203/1138489999008993370">https://discord.com/channels/1032262304387059754/1117670153774170203/1138489999008993370</a>
오리진	Website (if applicable)	
	Discord Server ID	1128292662034825288
	Infringer UID	947979138667540511
	Invite Code	<a href="https://discord.gg/HHYDzTb3JF">https://discord.gg/HHYDzTb3JF</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1128292662034825288/1138728294406180875/1138728698900643840">https://discord.com/channels/1128292662034825288/1138728294406180875/1138728698900643840</a>
세리아	Website (if applicable)	
	Discord Server ID	1191268241058836590
	Infringer UID	1115994186307620895, 364450192373710859
	Invite Code	<a href="https://discord.com/invite/futjGZ2A4z">https://discord.com/invite/futjGZ2A4z</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1191268241058836590/1191268868493160580/1209125975397371994">https://discord.com/channels/1191268241058836590/1191268868493160580/1209125975397371994</a>
메테르	Website (if applicable)	
	Discord Server ID	1195242607811494008
	Infringer UID	1021308395833266176
	Invite Code	<a href="https://discord.gg/2Rv7n3jZjB">https://discord.gg/2Rv7n3jZjB</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1195242607811494008/1197501328516194304/1207676558429528064">https://discord.com/channels/1195242607811494008/1197501328516194304/1207676558429528064</a>
리플렉스	Website (if applicable)	<a href="https://t.me/reflex_maple">https://t.me/reflex_maple</a>
	Discord Server ID	1204381847165997096
	Infringer UID	854092951911137291, 344509299998982159
	Invite Code	<a href="https://discord.com/invite/MzkaNC387h">https://discord.com/invite/MzkaNC387h</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1204381847165997096/1204398549165408317/1207178255820394537">https://discord.com/channels/1204381847165997096/1204398549165408317/1207178255820394537</a>
랩소디	Website (if applicable)	
	Discord Server ID	1207671464652967957
	Infringer UID	1207667864711200860
	Invite Code	<a href="https://discord.gg/Fpwz7bAJMb">https://discord.gg/Fpwz7bAJMb</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1207671464652967957/1207688900328300574/1211597377031372800">https://discord.com/channels/1207671464652967957/1207688900328300574/1211597377031372800</a>
블루	Website (if applicable)	
	Discord Server ID	1178486469892001842
	Infringer UID	1172863073464360987
	Invite Code	<a href="https://discord.gg/tvPweZPCNa">https://discord.gg/tvPweZPCNa</a>

	Example message link of infringing activity	<a href="https://discord.com/channels/1178486469892001842/1179591718614609930/1206198091192078366">https://discord.com/channels/1178486469892001842/1179591718614609930/1206198091192078366</a>
플로라	Website (if applicable)	
	Discord Server ID	1199669780177752145
	Infringer UID	1196981501976387594
	Invite Code	<a href="https://discord.gg/rbF336mFqs">https://discord.gg/rbF336mFqs</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1199669780177752145/1207624871660625972/1207624871660625972">https://discord.com/channels/1199669780177752145/1207624871660625972/1207624871660625972</a>
하인즈	Website (if applicable)	
	Discord Server ID	1200017801524559904
	Infringer UID	833228823582605343, 189003694250000384,1203602252883951 696
	Invite Code	<a href="https://discord.gg/BCYg7kn5TA">https://discord.gg/BCYg7kn5TA</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1200017801524559904/1200220053312897085/1214581407955820564">https://discord.com/channels/1200017801524559904/1200220053312897085/1214581407955820564</a>
아오지	Website (if applicable)	
	Discord Server ID	1216326709217857576
	Infringer UID	1216326035583270994
	Invite Code	<a href="https://discord.com/invite/9hfkm8mQU3">https://discord.com/invite/9hfkm8mQU3</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1216326709217857576/1216352241485877258/1218525789600088164">https://discord.com/channels/1216326709217857576/1216352241485877258/1218525789600088164</a>
히라	Website (if applicable)	
	Discord Server ID	1217786672465576007
	Infringer UID	711304489356754954
	Invite Code	<a href="https://discord.gg/Bd9YgkbegJ">https://discord.gg/Bd9YgkbegJ</a>
	Example message link of infringing activity	<a href="https://discord.com/channels/1217786672465576007/1218154868330463262/1218169566169927741">https://discord.com/channels/1217786672465576007/1218154868330463262/1218169566169927741</a>

## 2. Wanted Infringer -Infringing Material is a Server itself

Server Name	Category	Description
메이플 루시	Website (if applicable)	
	Discord Server ID	1172898019482542152
	Infringer UID	1172880880163885116
	Invite Code	<a href="https://discord.com/invite/DSE29HAX6X">https://discord.com/invite/DSE29HAX6X</a>
	Bot	
메이플 올드	Website (if applicable)	
	Discord Server ID	1051859768676974623
	Infringer UID	982990103657988146, 1191333391119958069, 544774873126535178
	Invite Code	<a href="https://discord.com/invite/TpGh4NMSTm">https://discord.com/invite/TpGh4NMSTm</a>
	Bot	1057664099904933918
라즐리	Website (if applicable)	
	Discord Server ID	1232912081112662046



	Infringer UID	1752866798390607934
	Invite Code	
	Bot	1233584587658104953
메이플 로얄	Website (if applicable)	
	Discord Server ID	964822228724244530
	Infringer UID	871229837380034601
	Invite Code	<a href="https://discord.com/invite/2TzgNx3sGY">https://discord.com/invite/2TzgNx3sGY</a>
	Bot	1017093401474252881, 966200811464036373
메모리	Website (if applicable)	
	Discord Server ID	1187057937550688286
	Infringer UID	953101791267024956
	Invite Code	<a href="https://discord.com/invite/rWtYRaz3aW">https://discord.com/invite/rWtYRaz3aW</a>
	Bot	